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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

RODRIGO SANTOS,

Defendant.

CASE NO. NO. CR 21-268-SI

**STIPULATION AND ~~PROPOSED~~ ORDER
CONTINUING STATUS CONFERENCE AND
EXCLUDING SPEEDY TRIAL TIME**

Hon. Susan Illston

STIPULATION AND ~~PROPOSED~~ ORDER
NO. CR 21-268-SI

1 The above-captioned matter is set for a status conference on April 22, 2021, at 11:00 a.m. After
2 consultation with the courtroom deputy, the parties jointly request that the status conference be
3 continued to July 22, 2022, at 11:00 a.m. and that the time between April 22, 2022, and July 22, 2022,
4 be excluded from computation under the Speedy Trial Act. Mr. Santos is out of custody. This
5 continuance will provide defense counsel with needed time for effective preparation of counsel,
6 including reviewing discovery and investigating the facts and circumstances surrounding the allegations
7 in the indictment, and provide for continuity of counsel. The government has produced substantial
8 discovery, including voluminous financial records, which defense counsel requires additional time to
9 review and analyze. Additionally, counsel for Mr. Santos is set to begin a three-week jury trial in San
10 Mateo County Superior Court on May 13, 2022, and government counsel is set to begin a two-week jury
11 trial on June 6, 2022, in *United States v. Rhodes*, CR 17-0093-WHA. Therefore, the parties request a
12 continuance until July 22, 2022, on which date the parties expect to propose a resolution for the Court's
13 approval or request a trial date. The parties stipulate that the interest of justice outweighs the interest of
14 the public and the defendant in a speedy trial. 18 U.S.C. § 3161(h)(7)(A), (B)(iv). Therefore, the parties
15 respectfully request that the April 22, 2022, status conference be continued to July 22, 2022, and that the
16 time between April 22, 2022, and July 22, 2022, be excluded from computation under the Speedy
17 Trial Act.

18
19 DATED: April 19, 2022

Respectfully submitted,

20 STEPHANIE M. HINDS
21 United States Attorney

22 /s/
23 CASEY BOOME
24 Assistant United States Attorney

25 DATED: April 19, 2022


26 /s/
27 RANDALL KNOX
28 Counsel for Defendant

~~[PROPOSED]~~ ORDER

For the reasons stated above, the Court finds that the interest of justice served by granting a continuance outweighs the interest of the public and the defendant in a speedy trial, 18 U.S.C. §§ 3161(h)(7)(A), (B)(iv). Accordingly, the Court HEREBY ORDERS that the April 22, 2022, status conference shall be continued to July 22, 2022, at 11:00 a.m. and that the time between April 22, 2022, and July 22, 2022, shall be excluded from computation under the Speedy Trial Act. Based on the stipulation of the parties, the Court finds this exclusion necessary to allow for the effective preparation of counsel and continuity of counsel. 18 U.S.C. § 3161(h)(7)(B)(iv).

IT IS SO ORDERED.

DATED: April 19, 2022


HON. SUSAN ILLSTON
United States District Judge